

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Cheri Marie Hanson, as trustee for the next of kin of Andrew Derek Layton, **Case No.: 15-CV-04578 (MJD/SER)**

Plaintiff,

vs.

Daniel Best, Audrey Burgess, Craig Frericks, Kyley Groby, Matthew Huettl and Kenneth Baker, individually and acting in their official capacities as City of Mankato Department of Public Safety Police Officers; Gold Cross Ambulance, Michael Jason Burt, and Thomas John Drews,

**SUPPLEMENTAL AFFIDAVIT OF  
VICKI A. HRUBY**

Defendants.

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STATE OF MINNESOTA            )  
  )ss:  
COUNTY OF WASHINGTON    )

Vicki A. Hruby, being first duly sworn on oath, states as follows:

1. I am one of the attorneys representing Defendant Officers Daniel Best, Audrey Burgess n/k/a Kranz, Craig Frericks, Kyley Groby n/k/a Lindholm, Matthew Huettl and Kenneth Baker in the above-captioned matter and make this Supplemental Affidavit in Support of Defendant Officer's Reply Memorandum of Law in Support of Their Summary Judgment Motion.

2. Attached hereto and marked as Exhibit 33 is a true and correct copy of excerpts of Director of Public Safety, Todd Miller's deposition transcript.

3. Attached hereto and marked as Exhibit 34 is a true and correct copy of the expert report of James R. Stone, M.D., Ph.D.

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

  
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Vicki A. Hruby

Subscribed and sworn to before me  
this 19th day of May, 2017.

  
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Notary Public

